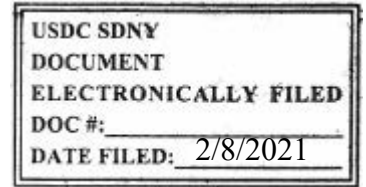


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



United States of America,

—v—

Tyrone Woolaston,

Defendant.

18-cr-212 (AJN)

ORDER

ALISON J. NATHAN, District Judge:

The Court received the attached pro se application for bail pending appeal from the Defendant by mail. So long as the Defendant is represented, all applications on his behalf must be made through counsel. Defense counsel shall confer with the Defendant and inform the Court by February 16, 2021, whether an application is being made on the Defendant's behalf.

SO ORDERED.

Dated: February 8, 2021
New York, New York

A handwritten signature in black ink, appearing to read "Alison J. Nathan".

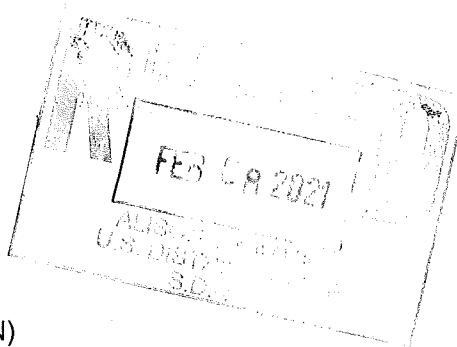
ALISON J. NATHAN
United States District Judge

TRULINCS 85369054 - WOOLASTON, TYRONE COREY - Unit: NYM-K-N

FROM: 85369054
TO:
SUBJECT:
DATE: 01/21/2021 09:06:45 PM

Tyrone Woolaston 85369-054
Metropolitan Correctional Center
150 Park Row
New York, NY 10007

Honorable Alison J. Nathan
Thurgood Marshall Courthouse
40 Foley Square
New York, NY, 10007



RE: United States vs. Tyrone Woolaston 18-cr-212 (AJN)

Honorable Alison J. Nathan, District Judge;

I am writing to humbly ask you to reconsider your decision on my bail request during my appeal proceedings. Since my sentencing date on December 12, 2020. The Metropolitan Correctional Center(M.C.C.) (150 Park Row New York, NY 10007) has entered into another lockdown. This is besides the national lockdown.(A guard testing positive then coming around quarantined inmates. Unprintable bulletin*).

When I self surrendered in February 2018, I was taken to the Metropolitan Detention Center(M.D.C. Brooklyn), I went without any disciplinary issues and encountered various conditions. Until I was able to acquire counsel and urge them to request bail. The late Honorable Robert W. Sweet granted bail. I submitted myself to all rules, testing, and restrictions. I violated none. The conditions at the M.D.C. Brooklyn gained national attention in October 2018, and later with the Federal Defenders of New York vs. BOP, 2020 U.S. App. Lexis 8845(2nd. Cir Mar. 20,2020)

After my trial on Feb, 21, 2019. I was moved to M.C.C. unit 11 South. I have been there longer than a year. I have gone to great lengths to stay a model inmate and tried to document the conditions I have lived in. While there is a global pandemic I wish to relay the conditions have been long before national outrage. I have gone through weekly lockdowns for just manpower shortage which had nothing to do with inmate behavior. In particular this was every weekend from April-August 2019. I have tried to send exhibits A-H, to present some points. Exhibit F is an addition to exhibit A, with the death of an inmate in November 2019 in unit 11 South. After the death of Jeffrey Epstein in August 2019.

Judge Nathan I have had more than 10 Co-vid tests (all negative). I have continued to work when possible. I have not had a social visit since the jail had a fire in my unit 11 south (Dec. 2019). After which M.C.C. went on lockdown looking for the loaded gun which they found in February 2020. Social visits which were already very limited Exhibit A. Recreational time (outdoor on the roof) has been nonexistent, which at best was twice a week prior. For an hour each trip. I have witnessed several fire in the building two of which I was evacuated from my unit. One in which I did my part to the best of my abilities to keep everyone safe (Exhibit H). I am not a maximum level inmate nor have I ever been.

From my P.S.I. and letters, I have a strong community ties and will always be a hard worker. I will continue during and after this chapter in my life. I do have high blood pressure that is documented from my personal doctor James Cort and B.O.P. Staff. I have had a few altercations with breathing from the work at the fire department. But, with exercise and diet I have went unbothered with breathing and my pressure. Being in a cell 23 1/2 hours (Exhibit E,F) every other day there's really no way to be healthy or clean. That's an hour and half out of the cell all week to shower, and until recently contact family via: computer or phone. I have gone stretches where the only food given was the emergency box meal (bologna) soaked in sodium. M.C.C. has fell short on many of their promises in one aspect or the other. (Exhibits: B,D,E,F,G,)

I have moved forward for an appeal with additions to my procedure 29/33 motions which I know you considered. Adding the decision of United States v. Purcell 19-238-cr, among other things. There has been no time to do any law work in the library or anywhere else. The conditions here are horrid (Exhibits A,F). I would like to believe without the mandatory minimums of my case these things would warrant sentence reductions. I will self surrender to whichever facility the B.O.P. has chosen. As of now there are no movements. Though I pray for consideration from the Appellate Courts.

I have not been able to present some bulletins because they were made unprintable or removed. (Exhibit C is just one that was

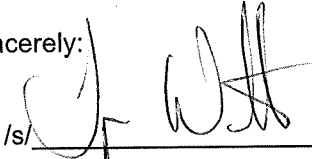
TRULINCS 85369054 - WOOLASTON, TYRONE COREY - Unit: NYM-K-N

removed).

I believe your honor has voiced concern over the treatment and conditions of all inmates. I humbly ask for reconsideration for my mental and physical well being.

Thank you for you time and consideration in this matter.

Sincerely:

/s/ 
Tyrone Woolaston

cc:

Hon. Alison J. Nathan via: postal mail
Nicole Thompson via: postal mail
copy retained

TRULINCS 85369054 - WOOLASTON, TYRONE COREY - Unit: NYM-K-N

FROM: 85369054

TO:

SUBJECT: Key

DATE: 01/21/2021 09:03:54 PM

Exhibit A:

Notice of Motion RE: Harsh Conditions

Exhibit B:

Modified Operations. After the search for the loaded gun had begun.

Exhibit C:

Bulletin removed for the system to alert region.

Exhibit D:

Bulletin of Pandemic

Exhibit E:

Request to Staff: Assistant Warden

Exhibit F:

Addition to Harsh Conditions

Exhibit G:

Request to Staff: Questions to Assistant Warden and Response

Exhibit H:

Letter from staff of involvement extinguishing fire.

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

United States of America

v.

Docket No. :

NOTICE OF MOTION
RE: HARSH CONDITIONS

Under #3553(a), The district court can consider harsh conditions of the defendant's pre-trial confinement. Which may be meritorious for a downward departure. Numerous district courts have agreed that the Metropolitan Correctional Center (M. C. C.) is a facility which is harsh and inhumane and thus warrants consideration for a departure.

The second circuit also has upheld the district court's decision in departing downwardly on the grounds of harsh confinement at M. C. C. in a pre-trial and pre-sentencing setting. See *United States v. Mendola*, S2 03 Cr. 449 (KMW) Honorable Judge Kimba Wood took into consideration Mendola's harsh confinement at M.C.C. and departed 10 months from his final sentence. See also *United States v. Mateo*, 229 F. Supp 2nd 201, 212 (SDNY 2004), see also *United States v. Hernandez-Santiago*, 92 F.3d 97, 101 n.2 (2d Cir. 1996) to which the court departed three levels based on 22 months of harsh confinement in the United States facility. See also *United States v. Lara*, 904 F.2d 599 (2d Cir. 1990) in which the court departed from a guideline of 121-151 months to 60 months taking into consideration in part, the defendant's harsh confinement during pre-trial and pre-sentence.

The harshness of _____ confinement bears on sentencing in so far as one of the purposes of sentencing is to afford just punishment for the offence and respect for the law. 18 U. S. C. #3553(a)(1). Since his arrest on _____ a period of _____ months and _____ days when he is to be sentenced, Mr. _____ has been continually confined in a federal pre-trial facility at (M. C. C.). The facility is not designed for long term stays. See *United States v. Behr*, 2006 WL 1586563 *5 (SDNY 2006) (Sweet, J.) further noting that harsh conditions at M. C. C. were recognized by Judge Kimba Wood as a basis for substantial sentence reduction. Inmates movements are severely restricted at all times. They have little opportunity to participate in social programs, very limited access to personal development programs, exercise, physical training or recreation, and almost no chance to be outdoors.

Pre-Trial and Pre-Sentencing Marsh Confinement Conditions
Metropolitan Correctional Center (M. C. C.): Unit Eleven South
Exhibit "A"

Sanitary Conditions:

- One urinal and one toilet for 26 inmates, per dorm.
 - a.) Broken urinals in most of the dorms; urinals expell water onto the floors leaving foul odor and spreading of disease.
 - 1.) Urinals have been broken and have not been repaired for more than 2 months.
 - b.) Toilets unable to facilitate the volume of waste produced from 26 inmates. Days where toilets are unuseable due to plumbing.
 - 1.) Plumbing in these dorms are not designed or able to accommodate large number of inmates.
 - 2.) April of 2014, inmates forced to relieve themselves of waste in buckets and bags when water was turned off
- One shower stall with no shower head or regulator.
 - a.) Floor in shower damaged; tiles on floor have sharp edges.
 - b.) Shower curtain rarely replaced. Damaged, torn and covered in gunk.
 - 1.) Torn curtains allow water out of the shower, making the bathroom floor slippery and dangerous.
 - c.) Water temperature generally uncontrollable.
 - 1.) Temperature exceeding 160 degrees fahrenheit, causing burns up to second degree.
 - d.) Water pressure strong enough to break blood vessels, leaving welts on one's chest and back.
- Lack of sanitary and cleaning supplies.
 - a.) Inmates forced into purchasing bar soap to wash hands.
 - b.) Toilet paper issued once per week.
 - 1.) Period of almost 3 weeks of no toilet paper issued Sept. 2014
 - c.) Cleaning supplies rarely issued for in-dorm sanitary needs.
 - 1.) Spray cleaner is hardly shared with inmates by staff and when it is, it is watered down; cutting it's cleaning properties.
 - 2.) No rubber gloves issued for cleaning bathrooms, leaving one open to fecal and urinary waste when trying to maintain a sanitary living space.
 - 3.) Inmates are also left with dirty mop heads for weeks, festering with grime and disease.

Pre-Trial and Pre-Sentencing Harsh Confinement
 Metropolitan Corrections Center (M. C. C.)
 Exhibit "B" : Comparative Analysis between maximum security
 facility(M.C.C.) and other facilities or prisons
 of different security levels

Subject Analysis: Visitation Hours Permitted

Facility Name	Weekly	Monthly	Annually
1. M. C. C.- New York	1 Hour	4 Hours	52 Hours
2. Camp- Danbury, CT	16 Hours	64 Hours	832 Hours
3. Low Security Prison	16 Hours	64 Hours	832 Hours
4. Medium Security Prison	16 Hours	64 Hours	832 Hours
5. High Security Prison	16 Hours	64 Hours	832 Hours
Comparison Total:	15 Hours	60 Hours	780 Hours
Percentage Analysis:	1500%	1500%	1500%

Sanitary Conditions:

- Bathroom ceilings coated in grime and black mold.
 - a.) Mold present prior to 2012.
 - 1.) During October 2014 inspection by the Department of Justice, it was ignored by inspectors.
 - b.) No means of ventilation in the bathrooms.
 - 1.) Paired with high water temperatures, breathing becomes near impossible.
 - c.) Due to lack of ventilation, water builds up onto the ceilings and drops down on to clothes and inmates.
- Black mold above beds and directly exposed to inmates faces.
- Infestation of disease carrying rodents and insects.
 - a.) Mice and rodents in and around inmates property.
 - 1.) Rodents create nests under beds caked in fecal matter and urine. Upon cleaning for the October 2014 inspection performed by the Department of Justice, large quantities of nest were uncovered, but no protective handwear/facewear issued to keep workers free of contact with rodent waste.
 - 2.) Rodents climb all over inmates belongings, including packaged foods, and clean clothes that leave deposited feces on such items.
 - b.) Flies and cockroaches, particularly the American cockroach, infest the dorms and the main communal area.
 - 1.) The cockroaches damage packaged foods, spread bacteria, and leave fecal matter in property lockers.
 - 2.) Cockroaches climb on inmates while they are asleep across the beddings as well as coming in direct contact with the human body such as the arms, legs, and face.
 - 3.) These insects are found on the food served and land on food trays during the course of eating.
- Barber cadre are not trained properly and practice very unsanitary work habits.
 - a.) Barber's never sanitize clippers after each haircut.
 - b.) Unclean and poorly maintained machines.
 - 1.) Many inmates have been cut while receiving haircuts that leave blood and skin clumped between the clipper blades.
 - 2.) High risk of spreading disease, viruses, and fungus between inmates.
 - c.) Proper practice guidelines are clearly posted, but are never sustained.

Unsafe Conditions:

- Large pile of dirty beds and foot lockers in the main communal area near the telephones and gym, resulting in fire hazard, safety hazard and health hazard.

Miscellaneous Conditions:

- Meager dietary meals issued with high sodium levels.
- 8 seats per tier for 26 inmates to share.
- Lack of facilitation of programs and education, both certificate and non-certificate.
- 4 straight weeks of no law library and discovery access in August 2014.
- Maximum level of security imposed on pre-trial detainees violating many of inmates rights.
- Lack of structure in religious services department; denial of religious services, unable to attend catholic or muslim services due to understaffing, Kosher and halal meals not issued to inmates upon request and completely ignored.
- Visitors are unable to use the restroom due to smuggling of drugs and other contraband after thoroughly being searched upon entrance into the facility.
- One working discovery computer in the unit and has not been repaired since the last week of July 2014 (violation of rights)
- 15 people per law library visit of 156 inmates are permitted to attend, only allowed access 2 times per week for 2 hours.

Exhibit B

MCC NEW YORK INMATE BULLETIN

Subject: Modified Operations

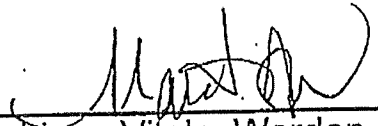
MCC New York has been placed on secure status effective Thursday, February 27th, 2020, due to security concerns. The SIS department is investigating and a decision to return the facility to normal operations will be made once we have gathered the necessary information.

As long as inmates continue to conduct themselves respectfully, we will attempt to return back to normal as soon as possible without compromising the security of the institution. Staff will continue to make rounds throughout the institution to address any concerns that may arise. A decision about returning the facility to normal operations has not yet been reviewed; however, visitation remains canceled.

I do understand this decision has negatively impacted your period of incarceration; however, please know this decision was made to ensure we maintain the safety of staff and inmates.

You will continue to receive meals as scheduled, showers, and linen exchanges, and sanitation items. You will be notified later this week as this information is updated.

Any concerns should be brought to the attention of your unit team.


M. Licon-Vitale, Warden

3/3/2020
Date

Exhibit C

Inmate Notification

The Department of Justice Office of the Inspector General (OIG) is discontinuing the temporary email mailbox called **COVID OIG Hotline**. Allegations of misconduct by employees of the U.S. Department of Justice may be sent to the following address:

U.S. Department of Justice
Office of the Inspector General
Investigations Division
950 Pennsylvania Ave., NW
Washington, DC 20530

For immediate assistance in the event of an emergency, please contact institution staff.

5-22-20

WOOLASTON, TYRONE 85369054

Exhibit D



U.S. DEPARTMENT OF JUSTICE
Federal Bureau of Prisons
Metropolitan Correctional Center

150 Park Row
New York, New York 10007

June 2, 2020

MEMORANDUM FOR INMATE POPULATION

FROM:

A handwritten signature in dark ink, appearing to read "M. Licon-Vitale".

M. Licon-Vitale, Warden

SUBJECT:

Nation-Wide Lock Down

As you are aware, our Nation is facing difficult times as emotions run high and peaceful protests have turned into violently charged demonstrations. In an effort to maintain the safety and security of the institution, a lock down has been initiated. This lock down is not punitive. This is not intended to be a long-term lock down. We anticipate to return to a less restrictive operation in the near future and in keeping with our continued mitigation efforts with regard to COVID-19. However, we are committed to preventing any type of disruption from occurring, and I strongly emphasize any type of violent behavior will never be accepted or tolerated at this facility.

It is my expectation of the inmate population that you make the best of your time. You should adhere to the rules and regulations of the institution, treat staff and fellow inmates with respect and follow all orders given by staff, especially during times like these. Additionally, it is expected all inmates adhere to cell sanitation and housekeeping standards.

The safety and security of staff and inmates is the highest priority. Institution staff will continue to make rounds and address any concerns that may arise. Every attempt will be made to ensure the inmate population is provided showers, phone calls, and nutritional meals throughout the course of this lock down, including one hot meal each day. You will be notified of any additional modifications to institution operations.

Your cooperation and flexibility is appreciated as we are doing everything we can to ensure the safety and security of our staff, inmates, and the general public. We are continually monitoring updates nationally and will share with you as the information becomes available. Staff from the various departments will be making rounds throughout the institution, so please be patient as we work through this critical time.

Exhibit E

TRULINCS 85369054 - WOOLASTON, TYRONE COREY - Unit: NYM-K-N

FROM: 85369054

TO: Warden

SUBJECT: ***Request to Staff*** WOOLASTON, TYRONE, Reg# 85369054, NYM-K-N

DATE: 07/21/2020 09:57:41 PM

To: Mrs. Edge

Inmate Work Assignment: kitchen

Mrs. Edge,

I am writing because you will actually hear my concerns. We (inmates) have been on lockdown for the last few months. Recently, put on 23 1/2 hours in the cell, there is not enough time to clean a cell, shower, contact family, and/or doing anything concerning any of our/my case. There has been no attention to any medical concern outside of Co-vid. I have blood pressure issues and there has been nothing I can do as far as physical activity. No books for mental stability. There hasn't been a main line to address my concerns and 11 North is without a true counselor. There must be something that can be done if 11 South has to live in closer proximity. Even now there isn't enough time to address you fully. Thank you for your time, consideration, and timely response.

Thank you.

Exhibit F

TRULINCS [REDACTED] Unit: NYM-K-N

FROM [REDACTED]
 TO:
 SUBJECT:
 DATE: 07/22/2020 08:37:00 PM

This is an amendment to the previous paperwork given to my lawyers on the conditions at Metropolitan Correctional Center (MCC), 150 Park Row New York, NY 10007. I have been an inmate in Unit 11 South for over a year. With the grouping of 26 inmates forced to share one shower, one toilet, one urinal, and one sink. Often, broken, leaking and with no ventilation. Bunk bed setting where inmates are forced to get creative on how to reach their beds on the top bunk. Infested with rats, roaches, and bugs. There as been the death of a fellow inmate in recent months besides Jeffrey Epstein. Reasons not made public but suspected drugs from unknown sources. We have had countless stabbing, beatings, cuts, not reported due to lack of routine checks. Constant lockdowns due to lack of staff. This continued for months on end over the summer and holidays every weekend(Friday-Sunday).

An inmate was found dead(unresponsive) in the unit.

12-8-2019- We (inmates) reported prior scents of smoke to officers. We were told that it came from "the box" (Unit 9 South SHU - Special Housing Unit). But, on this morning after being locked in at 08:30 am there was a strong scent. It was disregarded by the guard(TDY). A faint grey smoke started to come from the vents. Inmates called the guard, there is no emergency notification in the tiers. Suddenly a dense black smoke started to bellow out of the vent. Inmates called for the guard as it started to fill the tier, inmates reached the ground as the struggled to breathe when the gates were finally opened. Led in the direction of an inmate with prior fire fighting experience. No plan was followed as we were directed to the gym a place that was not a safe refuge. Which also filled with smoke. The inmate led the unit to the divesting room where they pleaded to get the door opened.

*There was no evacuation plan.

*NO sprinklers activated. (Recovery of melted chairs and a locker that was destroyed because of the proximity of the vent)

*The use of elevators to the roof in a building fire. Inmates were forced from the visiting rooms were temperature is controlled to the elevators. Thinking they may go to lower floors. Since the fire was on the 11th floor. Inmates where taken to the roof the 12th floor.

Roof conditions- Inmates were taken to roof-"as is" in the start of December. in shorts, t-shirts, etc. -no outer gear. Temperature was a chilling 20 degrees. Being that most inmates were asleep, they were taken to the roof to the cold, where there is no bathroom. 150 inmates trying to huddle to be warm or move around. Inmates were on the roof for more than (4) hours. Four (4) jackets and eight (8) blankets were given out. Which made a hostile and unstable environment even worst. Besides conditions of the weather inmates begged for warmth, food, water, and the bathroom. Medical staff only saw those that were 55 years old and older.

Inmates were brought back to the same floor and visiting room regardless of smoke inhalation from overhaul. Much more pressing was trying to use the bathroom than trying to recover from the temperature and then breathing. They were given cold bags for food. With frozen food.

Post fire- The warden closed the two tiers that were most affected by the fire (Tiers 9 and 10). (Which I was a part of.) Inmates were to report to the fire unit and were added to the remaining tiers. Swelling the number from 26 inmates to 30-31. With the same previous conditions, given cots to sleep on. Cots were put on the center areas of the tier were we had to step over each other. To think if there was another fire this would have been a bigger problem. Cots were now inches from the floor with rodents even closer to you. Still to share the one bathroom among us all. And, adding the smoke residue still in the unit. With now bare supplies and less space in any event. These conditions lasted over two weeks.

2-27-20 Inmates were put lockdown status. This started the bag food (cold food), breakfast, lunch, and dinner. No ice or hot water was provided.

2-28-20 SORT teams from various locations started their takeover of the institution. Demanding inmates to lie on those same floors in excess of 2 hours. Regardless of clothing or condition (medically). Telling us to do positions that were physically compromising. Guns and weapons drawn. This is response to one of their own bringing a deadly weapon into the building. Where we are now all potential victims. During and after if you obtained any injuries you were subject to your own remedies. Put to be bare foot in one area for more than 2 hours. Food and water were not a priority. Again issues of relieving oneself became strained. SORT teams destroyed anything of value whether institution or personal. Meals were given as they saw fit.

2/29-3/6/2020 SORT teams continued the same course of action. There were no showers, toiletries, or laundry. No contact with family, lawyers, or cleaning supplies. There began a hunger strike just to get some dialogue. In which they turned to more ill

TRULINCS [REDACTED] Unit: NYM-K-N

treatment and dogs. While inmates asked for hot water, hot meals, and contact with family members.

3/8/20 Inmates were served one hot meal in between bag meals.

3/9/20 Inmates have been taken to the third floor regularly put through body scans and strip searches. But were locked into a broken cell with toilet overflowing with waste. X rayed, stripped, barefoot for hours. While units were again destroyed by SORT teams for what little inmates had left. No bedding or supplies were given.

*During this search there was no medical attention for any inmates in my unit. For any mental or physical harm that you may have obtained. There was no unit team, legal team, or MCC staff. No ice or hot water given. Inmates were shot by guards throughout the building. Panic attacks started along with colds and hunger pains. Toilet paper was non existent. Inmates were ignored by staff, and what little communication you had with family was taken away. To try to prepare for your case was impossible i.e.: trial, appeal, sentencing. MCC staff called out of work due to ill treatment from SORT teams. Legal and personal property was disregarded. Inmates were told to fill out "Tort" claims (all thought we were told to count it as a lost).

*A gun was recovered where inmates were just as much victims as any staff member. Due to the number one principle of safety. While in custody, for any inmates are pre-trial, with allegations. Even those that have pleaded guilty has not been sentenced or death. Every inmate was made to know this real realization.

As Covid -19 approached, inmates were moved from their cells and units. Where they put everyone with medical issues and 55 years and older in one unit, along with cadres. Of course this is the first unit to claim a Co-vid case.

Co-vid

There has been no medical attention for anything other than Co-vid. While been locked in the cells we had to resort to paper medical slips. Which were ignored, or disregarded. Initially no cleaning supplies.

No law library.

No unit team

No hand sanitizer stations

No laundry

There were guards working in the Quarantined units with confirmed cases, and working in regular units.

4/1/2020 Inmates have already been locked down for a week. BOP implemented a "stay in place" measure. Not taking into account recent events. Loss of property and food. Inmates were given bag lunches for every meal from the onset. There was no ice or hot water for those that needed tea, or hot meals. Locked in cells with no shower for days. No laundry, and not hot water from faucets. How could you possibly wash your hands and face in ice cold water. Food given on a "when we get to you basis." Even, milk given was expired. But, no access to legal to inform representatives.

*There has been no contact with family or legal (via: phone or Corrlinks(email)). It has been advertised that inmates would receive 500 minutes of phone from 300 minutes limits. But inmates were locked down 72 hours at a time then give 50 minutes shower. So there was no time to actually use the phones. In which inmates worried about their families well being as they too were affected by the pandemic.

3/30-4/6 They were no showers given, no legal calls, and no one from "Unit Team" to speak to about conditions or health.

There have been many periods that inmates have been lockdown with no hot water from faucets. The stay in place order did not for inmates mental stability. And, have not been given any time for physical exercise. Shower time has become a concern. There is no one to issue concerns. And, without time out of the cell we can not send a "request to staff" email.

To try to do anything concern an inmates case (i.e.- prepare for trial, sentencing, appeal,) has been nonexistent.

Inmates were locked for entire weekend, with no communication. To where even a hunger strike took place. Over poor communication, and abuse to the phase orders put in place. No testing has taken place. Those inmates brave and fortunate to gain attention from staff where put on notice that any cases would be transferred to the "SHU" (Special Housing Unit) which is for disciplinary reasons.

The warden put out a bulletin about conditions AFTER a hunger strike by inmates because there was no communication and box meals all day. After a proposed visit by regional officials MCC then stepped up their sanitation it was not seen prior. There

TRULINCS [REDACTED] - [REDACTED] Unit: NYM-K-N

was a email line given to report negligence by officers and staff. And, the computers were out of order for almost a week. Once the computers came back on the email line was removed.

4/14/20 This is the first day since the lockdown that laundry came to the unit. They did not have enough clothes for the unit. Only t-shirts and socks were exchanged.

Inmates were given a hotline to reach regional directly over the conditions in the jail. Inmates were put on a lockdown, when we were released the hotline was removed.

5/28/20- Inmates were again without hot water from any faucets, and due to threats to legal representatives, there was a bulletin put out after (the next day 5/29/20)

6/2/20-Inmates have been without ventilation in cells during lockdowns. Again due to regional visits and legal troubles there was a bulletin put out after, 2 months of voicing concerns.

6/28/20- present -There was a positive case on Co-vid 19. Inmates were put on a 23 1/2 hour lockdown. In which inmates have no time to clean out the cell, shower, contact family, and/or try to make progress in their case. At no point has physical exercise been address. There has been no contact information from the higher echelon. 11 North at least has been without a true counselor.

Exhibit G

TRULINCS 85369054 - WOOLASTON, TYRONE COREY - Unit: NYM-K-N

FROM: Associate Warden Operations
TO: 85369054
SUBJECT: RE:***Inmate to Staff Message***
DATE: 12/04/2020 03:02:02 PM

Re: ***Request to Staff*** WOOLASTON, TYRONE, Reg# 85369054, NYM-K-N
There were repairs needed that required a shutdown of the water. I apologize for any inconvenience this may have caused.
As far as the schedule, 11N is currently under quarantine due to COVID-19. The quarantine will be lifted after Health Services has completed testing.

>>> ~^!"WOOLASTON, ~^!TYRONE COREY" <85369054@inmatemessage.com> 12/4/2020 10:56 AM >>>
To: Mrs. Edge
Inmate Work Assignment: Kitchen

Mrs. Edge

Thank you for giving us a counselor in 11North, or whatever your part was in it. You know we have not had a counselor since February. But, in holding accountable I'm not positive anyone looked at the schedule for the lockdown. We are on a tier that comes out at 7am every lock at with no variation. And, since there seems to be an indication that this lockdown will go pass two weeks can you please look in it. Also, the water was cut off two days ago with no warning. We can't come out and check the bulletin as you will know from work orders that the computers were down. And, having to live in those conditions for even 24 hours with no water and no prep seems inhumane. But thank you for your time, consideration, and looking into these matters.

Exhibit H

R. West, Lieutenant

MCC NEW YORK

150 Park Row, NY, NY 10007

December 12, 2020

To whom it may concern;

This short note is for Woolaston, Tyrone #85369-054 accommodating him in his efforts in helping me extinguish a fire on unit 11 south. On December 8, 2019 there was a heavy smoke condition on unit 11 south which quickly overtook the entire unit. As the inmates were being evacuated inmate Woolaston came to me and told me where the flames were coming from. As I grabbed the fire extinguisher he asked if he can help. I replied yes and he then grabbed another fire extinguisher and proceeded to help extinguish the flames that was located on tier #9. I did appreciate his willingness to help me extinguish that fire and want him to be recognized for his efforts.

A handwritten signature in black ink, appearing to read 'R. West', with a large, stylized flourish extending from the end of the signature.

R. West, Lieutenant